

REMARKS

Applicants have carefully studied the outstanding Office Action. The present response is intended to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

Applicants have amended claims **1, 2, 4 - 7, 11 - 13, 15, 16, 25** and **26**. No new matter has been added. Claims **1 - 26** are presented for examination.

In Paragraphs 4 - 10 of the Office Action, claims **1 - 6** and **17 - 26** have been rejected under 35 U.S.C. §103(a) as being unpatentable over Glogau, WO 98/25373 ("Glogau") in view of Erickson, U.S. Patent No. 5,765,152 ("Erickson").

In Paragraphs 11 - 15 of the Office Action, claims **7 - 16** have been rejected under 35 U.S.C. §103(a) as being unpatentable over Glogau in view of Granger et al., U.S. Patent No. 6,480,959 ("Granger") and further in view of Erickson.

In Paragraph 6 of the Office Action, in rejecting independent claims **1, 4, 25** and **26**, and similarly in Paragraph 12 of the Office Action, in rejecting independent claims **7, 11, 15** and **16**, the Examiner has indicated that (i) "*Glogau does not explicitly teach an administrative computer for retrieving a site map of folders and files within a server computer file system ...*"; and (ii) "*Erickson teaches a system and method for ... retrieving a site map of folders and files within a server computer file system ...*"

In their amendment and response filed on March 24, 2004, applicants presented arguments showing that Erickson operates on individual documents, and does not describe retrieving a site map of folders and files within a computer file system from a server computer to a remote administration computer. The Examiner has cited elements of FIG. 9 of Erickson and the discussion thereof at cols. 25 and 26. Applicant respectively submits that the locations cited do not disclose sending or receiving a site map of folders and files. The communication lines **212** and **218** in FIG. 9 of Erickson are used to transmit documents **204a-d**.

In this regard, an important distinction between the present invention and Erickson is that by retrieving a site map of folders and files from a server computer, the present invention enables a remote administrator to modify protection settings for an entire site at once, locally on the administrator's computer. As described on page 43, lines 16 - 21 of the present specification,

"Until the user clicks on the 'Submit' button, the protection settings he edited are only displayed within the protection management tool by his local computer. Only when he clicks the 'submit' button are his settings actually applied. If the user does not click on the 'Submit' button, then all of the protection settings he edited will not take effect, and the protection settings will remain at their former state if he closes the screen." Similarly, as described on page 24, lines 11 – 18 of the present specification, with respect to FIG. 3, *"Clicking on the 'submit' button causes protection settings 306 to be transmitted from remote computer 130 to server computer 100. When server computer 100 receives the modified protection settings, it incorporates them into protection status database 118."*

Such capability to remotely set protection settings for an entire site at once, as set forth in independent claims 1, 4, 7, 11, 15, 16, 25 and 26, is not disclosed in Erickson.

In order to further distinguish the independent claims over Erickson, which operates on one document at a time, applicant has amended these claims to include the limitation of setting protection status for a plurality of files.

For ease of reference, applicants are including excerpts from that March 24, 2004 response hereinbelow.

Distinctions between Claimed Invention and U.S. Patent No. 5,765,152 to Erickson

The present invention concerns copy protection of digital images stored on a server computer and available for viewing over the Internet. A remote administration tool provides an explorer-type interface for an administrator to set protection status of digital image files. Specifically, as disclosed in the present specification and as illustrated in the user interface of FIG. 13, protection manager 128 (FIG. 1) in remote computer 130 controls protection status of digital image files 108 and 110 resident on server computer 100. Steps 412 – 434 (FIG. 4) disclose computer 130 receiving a site map of folders and files from the file system of computer 100, selecting by a user of computer 130 at least one folder or file, and editing the at least one folder or file's protection status. After setting protection status for selected files, computer 130 sends the protection statuses to server computer 100, which enforces the protection (original specification / page 15, line 18 – page 17, line 10; protection manager 128 of FIG. 1 and the discussion thereof at page 20, lines 7 – 14; FIG. 3 and the discussion thereof at page 22, line 25 – page 24, line 21; FIG. 4 and the discussion thereof at page 24, line 22 – page 27, line 2; user interface illustrated in FIG. 13 and the discussion thereof at page 41, line 16 – page 42, lines 22).

Erickson concerns copyright management of digital media. Copyright protected media is stored within a document container that includes a minimum set of permissions granted, such as permission to view an image, for accessing the media. A user can obtain auxiliary permissions, such as permission to save, modify and print the image, through an authorization server that controls licenses to the media (Erickson / col. 2, lines 18 – 44).

Unlike Erickson, which operates on individual documents, the present invention operates on an entire file system. In particular, the document PACKAGER of Erickson only sets permissions for an individual document currently being worked on within the PACKAGER, and does not include selection of a list of files for setting protection status. Moreover, Erickson does not describe sending and receiving a site map of folders and files within a computer file system from a server computer to a remote management computer.

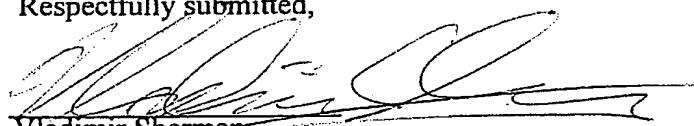
Applicant respectfully submits that the DOCUMENT-packaged source works in Erickson do not refer to separate files, but instead refer to derivative works encapsulated within a single document, in the sense of copyright. Specifically, at col. 11, line 65, Erickson recites "*The Source Works Extension 24 provides a bibliographic record, or 'persistence,' of copyright uses through generation of derivative work ... For example, information about successive derivative authors of the DOCUMENT 20 are stored sequentially as a Source Works Extension 24. By way of another example, one Source Work Extension 24 can include the release information for any performer whose image or audio likeness appears in the current DOCUMENT.*"

Support for Amended Claims in Original Specification

The limitation of setting protection status for a plurality of files is described in the original specification at page 23, line 25 - page 24, line 10; page 26, lines 7 – 13; page 42, lines 3 – 9 and lines 17 – 22; and FIG. 13.

For the foregoing reasons, applicant respectfully submits that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

Respectfully submitted,



Vladimir Sherman

Attorney for Applicant(s)
Registration No. 43,116

Dated: December 5, 2005

**Eitan Law Group
C/O Landon IP Inc.
1700 Diagonal Road, Suite 450
Alexandria, VA 22314
Tel: (703) 486-1150
Fax: (703) 892-4510**